



November 30, 2016

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RE: Wireline Competition Bureau Seeks Comment on Petitions Regarding Off-Campus Use of Existing E-Rate Supported Connectivity (CC Docket No. 02-6; WC Docket No. 10-90; WC Docket No. 13-184)

Dear Ms. Dortch:

The National Association of Telecommunications Officers and Advisors (“NATOa”)<sup>1</sup> has long advocated for increased deployment and adoption of high-speed broadband, recognizing the significant role that these services can play in boosting economic development, promoting civic engagement, bringing needed telemedicine services to communities lacking adequate medical care, and expanding educational opportunities for all Americans. Advanced broadband services are not simply a luxury, but a necessity for our youth of today to compete and succeed on the world economic stage.

It is fundamental that E-rate supported services must be used for educational purposes. As everyone knows, education does not stop when students leave school grounds. The need for Internet access is just as important off-campus as on. Surely the use of E-rate supported services to permit students to complete homework and engage in afterschool educational endeavors qualifies as an activity that is “integral, immediate, and proximate to the education of students” and we urge the Commission to grant these petitions.

In 2013, NATOa joined other commenters in encouraging the FCC to reform and update the E-rate program to ensure the availability of high-bandwidth services to schools and libraries. Now, we join others in encouraging the Commission to examine means by which students may have access to E-rate subsidized broadband networks at home for educational purposes without the obligation to cost allocate the portion of broadband traffic attributable to off-campus use. We believe that with proper guidance by the Commission, any issues of waste, fraud and abuse may

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<sup>1</sup> NATOa is a national trade association that promotes local government interests in communications, and serves as a resource for local officials as they seek to promote communications infrastructure development.

be properly addressed for these additional educational uses of E-rate subsidized services and will help bridge the “homework gap.”

Some may argue that the granting of the petitions may result in a change of focus away from efforts to ensure classroom connectivity. We disagree. Rather, we believe that granting the petitions will permit other school districts to look at creative ways to leverage E-rate supported services to improve the educational opportunities for all students.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Traylor". The signature is fluid and cursive, with a large initial "S" and a stylized "Traylor".

Stephen Traylor  
Executive Director